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Attorneys for Plaintiff
NATIONSTAR MORTGAGE LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

NATIONSTAR MORTGAGE LLC,

Plaintiff,

vs.

CASE NO. 2:18-cv-03041 DSF (RAOx)

JUDGE: Hon. Dale S. Fischer
CTRM.: 7D

**NOTICE OF LODGING OF
[PROPOSED] ORDER
FINDING DEFENDANTS
PATRICK J. SORIA, WEST H&A
LLC, WESTWOOD LEGAL, and
HBSC US IN ITS CAPACITY AS
LEGAL TITLE HOLDER
INCORPORATED IN CONTEMPT**

ACTION FILED: April 11, 2018
TRIAL DATE: None Set

PATRICK JOSEPH SORIA, an
individual; WEST H&A, LLC, a
Delaware Limited Liability Company;
WARRANTED EFFECTUATION OF
SUBSTITUTE TRANSFEREE INC,
AKA W.E.S.T Inc., a Delaware
Corporation; WESTWOOD LEGAL, a
California Corporation; WESTWARD
LEGAL, a California Corporation;
BRIGHTON LEGAL GROUP, PC, a
dissolved California Corporation; BLG
PC NATIONAL BY BRIGHTON
LEGAL GROUP, INC., a Delaware
Corporation; DEUTSCHE MELLON
NATIONAL ASSET, LLC, a Wyoming
Limited Liability Company;
CHRISTIANA WILMINGTON
GLOBAL ASSET CORP., a Delaware
Corporation; HBSC US IN ITS
CAPACITY AS LEGAL TITLE
HOLDER INCORPORATED. a

1 Delaware Corporation; CAMDEN
2 LEGAL GROUP, PC, a dissolved
3 California Corporation; TAMYRA
4 WHITE, an individual; GEORGE
5 WESLEY JR. PIERCE, an individual;
6 GRICELA MENDOZA, an individual;
7 BERNARD GERMANI, an individual;
8 REBEKAH BROWN, an individual;
9 MICHAEL C. JACKSON, an
10 individual; CYNTHIA LARA, an
11 individual; F. MARTINEZ, an
12 individual; JENNY DE LEON, an
13 individual; ELBA CHAVEZ, an
14 individual; RYAN ALEXANDER
15 URQUIZU, an individual; ROGER
16 FRANKLIN, an individual; AND
17 WHATEVER NAME THEY MAY DO
18 BUSINESS UNDER; and DOES 1
19 through 10 inclusive,

20 Defendants.

21 Plaintiff, Nationstar Mortgage LLC ("Nationstar") hereby lodges the
22 [Proposed] Order Finding Defendants Patrick J. Soria, West H&A LLC, Westwood
23 Legal, and HBSC US In Its Capacity As Legal Title Holder Incorporated in
24 Contempt, attached hereto as Exhibit A.

25 DATED: May 31, 2018

26 HALL GRIFFIN LLP

27 By: 

28 Howard D. Hall

Jered T. Ede

Timothy A. Burnett

Jane M. Kutepova

Cheyenne S. Schneider

Attorneys for Plaintiff

NATIONSTAR MORTGAGE LLC

EXHIBIT A

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NATIONSTAR MORTGAGE LLC

Plaintiff,

vs.

PATRICK JOSEPH SORIA, an individual; WEST H&A, LLC, a Delaware Limited Liability Company; WARRANTED EFFECTUATION OF SUBSTITUTE TRANSFEREE INC, AKA W.E.S.T Inc., a Delaware Corporation; WESTWOOD LEGAL, a California Corporation; WESTWARD LEGAL, a California Corporation; BRIGHTON LEGAL GROUP, PC, a dissolved California Corporation; BLG PC NATIONAL BY BRIGHTON LEGAL GROUP, INC., a Delaware Corporation; DEUTSCHE MELLON NATIONAL ASSET, LLC, a Wyoming Limited Liability Company; CHRISTIANA WILMINGTON GLOBAL ASSET CORP., a Delaware Corporation; HBSC US IN ITS CAPACITY AS LEGAL TITLE HOLDER INCORPORATED, a Delaware Corporation; CAMDEN LEGAL GROUP, PC, a dissolved California Corporation; TAMYRA WHITE, an individual; GEORGE WESLEY JR. PIERCE, an individual; GRICELA MENDOZA, an individual; BERNARD GERMANI, an individual;

CASE NO. 2:18-cv-03041 DSF (RAOx)

JUDGE: Hon. Dale S. Fischer
CTRM.: 7D

**[PROPOSED] ORDER FINDING
DEFENDANTS PATRICK J.
SORIA, WEST H&A LLC,
WESTWOOD LEGAL, and HBSC
US IN ITS CAPACITY AS LEGAL
TITLE HOLDER INCORPORATED
IN CONTEMPT**

Date: June 6, 2018
Time: 3:00 p.m.
Dept.: 7D

ACTION FILED: April 11, 2018
TRIAL DATE: None Set

1 REBEKAH BROWN, an individual;
 2 MICHAEL C. JACKSON, an
 3 individual; CYNTHIA LARA, an
 4 individual; F. MARTINEZ, an
 5 individual; JENNY DE LEON, an
 6 individual; ELBA CHAVEZ, an
 7 individual; RYAN ALEXANDER
 8 URQUIZU, an individual; ROGER
 9 FRANKLIN, an individual; AND
 10 WHATEVER NAME THEY MAY DO
 11 BUSINESS UNDER; and DOES 1
 12 through 10 inclusive

13 Defendants.

14 This Court's Orders to Show Cause re: Contempt against Patrick J. Soria,
 15 West H&A LLC ("West H&A"), Westwood Legal ("Westwood"), and, HBSC US
 16 In Its Capacity As Legal Title Holder Incorporated ("HUCLTH"), came on for a
 17 duly noticed hearing on May 30, 2018 at 1:30 p.m. in Department 7D of the above-
 18 entitled Court, the Honorable Dale S. Fischer, Judge, Presiding. Defendant Patrick
 19 J. Soria ("Soria") appeared for himself as an individual, as well as for his corporate
 20 entities West H&A LLC ("West H&A"), Westwood Legal ("Westwood"), and,
 21 HBSC US In Its Capacity As Legal Title Holder Incorporated ("HUCLTH").
 22 Sandford Frey from Leech Tischman Fuscaldio & Lampl, Inc. appeared in the
 23 limited capacity as bankruptcy counsel for Patrick J. Soria. Gary Owen Caris from
 24 Barnes & Thornburg LLP appeared on behalf of the Permanent Receiver Robb
 25 Evans & Associates LLC (the "Receiver"). Jered T. Ede and Jane M. Kutepova
 26 from Hall Griffin LLP appeared on behalf of Plaintiff Nationstar Mortgage LLC.
 27 There were no other appearances. Having considered the filings in support and in
 28 opposition herein in this case, the live testimony from Patrick J. Soria, and the
 arguments of counsel:

29 **THE COURT FINDS** Patrick J. Soria, West H&A, Westwood, and
 30 HUCLTH have willfully, knowingly, and regularly violated this Court's Orders and
 31 are therefore in contempt of Court;

32 ///

IT IS THEREFORE ORDERED THAT:

1. Patrick J. Soria, West H&A, Westwood and HUCLTH are hereby ordered to bring themselves into compliance with this Court's Order Entering Preliminary Injunction Against Defendants and Appointing Permanent Receivership ("Preliminary Injunction") (Dkt 46);

2. In order to purge this contempt, Patrick J. Soria ("Soria"), West H&A, Westwood, and HUCLTH are immediately ordered to:

- a. Disclose to and provide the Receiver the location of and access to all electronic and paper accounting records for the Receivership Defendants ("Receivership Defendants" is used throughout this Order to include all entities defined as such in the Preliminary Injunction and also specifically includes without limitation Soria individually), including without limitation QuickBooks;
- b. Disclose to and provide to the Receiver all locations of and access to all business operations for the Receivership Defendants;
- c. Disclose to and provide to the Receiver the location of and access to all electronic and paper consumer records for the Receivership Defendants;
- d. Provide the Receiver with a list of all tax identification numbers for the Receivership Defendants;
- e. Provide the Receiver with a list of all bank accounts, by name and account number, for the Receivership Defendants;
- f. Provide the Receiver full and complete copies of the 2015, 2016 and 2017 tax returns for the Receivership Defendants;
- g. Provide the Receiver full and complete written financial disclosures for the Receivership Defendants, executed under penalty of perjury, including without limitation detail concerning all assets, liabilities and income;

- 1 h. Provide the Receiver a list of all business activities the Receivership
2 Defendants have been involved in since January 23, 2018 including
3 a detailed status of each activity, including, but not limited to, a full
4 and complete detailed disclosure of all transactions, wires, or money
5 sent to/from the “Law Offices of Joseph F. Hart Client Trust
6 Account” and to any other trust account maintained by attorney
7 Joseph Hart;
- 8 i. Provide the Receiver a detailed disclosure as to all payments to any
9 Receivership Defendant or for their benefit, since January 23, 2018.
10 “Payments” include, without limitation, transfers of any money or
11 real or personal property or other thing of value, and whether or not
12 value was exchanged for the payment. This includes, but is not
13 limited to, a full and complete detailed disclosure of all payments
14 made to/from the “Law Offices of Joseph F. Hart Client Trust
15 Account,” and to any other trust account maintained by attorney
16 Joseph Hart, and the disposition of each such payment (i.e. to whom
17 the payment was released , who remains in possession of such
18 payment, if the payment has been transferred, if so a disclosure as to
19 who transferred it and the transferee of such payment), including
20 without limitation the payment of approximately \$513,000 for the
21 benefit of Defendant Deutsche Mellon National Asset, LLC on or
22 about March 22, 2018 in connection with the purported sale of real
23 estate in Frisco, Texas;
- 24 j. Turn over all funds received by the Receivership Defendants since
25 January 23, 2018, to the Receiver;
- 26 k. Provide the Receiver a detailed disclosure as to all payments made
27 by any Receivership Defendant or for its benefit, since January 23,
28

1 2018. “Payments” has the same meaning as set forth in paragraph
2 2(i) herein;

- 3 1. Provide the Receiver written confirmation under penalty of perjury
4 that the Receivership Defendants and CreativeNote have complied
5 with the Receiver’s repeated requests to lock the Receivership
6 Defendants out of all business email accounts and to provide the
7 Receiver unlimited access to all business email accounts. Soria,
8 West H&A, Westwood and HUCLTH are to provide the Receiver
9 with a list of and immediate access to and exclusive control of every
10 email used by any Receivership Defendant or any of its’ employees
11 or agents, including but not limited to “soria.patrick@gmail.com”
12 and “patrick.joseph.soria@gmail.com.” Nothing in this Order shall
13 constitute a waiver of any attorney-client privilege which may exist.
14 Furthermore, Soria, West H&A, Westwood and HUCLTH are to
15 provide the Receiver with a list of and immediate access and
16 exclusive control of every website used by any Receivership
17 Defendant;
- 18 m. Provide the Receiver full and complete disclosure as to all recorded
19 real property documents recorded by or on behalf of the
20 Receivership Defendants, in connection with any asserted
21 ownership interest in a secured promissory note, mortgage, deed of
22 trust, or other real property-related security instrument, or in
23 connection with any asserted real property ownership interest
24 obtained following the purported acquisition of an ownership
25 interest in a secured promissory note, mortgage, deed of trust or
26 other real property-related security instrument;
- 27 n. Immediately cancel any open escrow/transaction purporting to sell
28 any property, receive any payoff, or otherwise through which the

1 Receivership Defendants may receive some benefit, and provide the
2 Receiver with a list of all such escrows/transactions;

- 3 o. Provide a full and complete disclosure to the Receiver of each
4 payment (including amount and source of payment) to any attorney
5 since January 23, 2018, whether paid as a retainer or for services
6 rendered or otherwise, by the Receivership Defendants including
7 but not limited to any retainer paid to Leech Tischman Fuscaldo &
8 Lampl, Inc.;
- 9 p. Close any open PayPal accounts, provide the Receiver with any
10 balance remaining in such accounts, and provide the Receiver with a
11 closing statement for such accounts or other satisfactory proof of
12 closure;
- 13 q. Provide the Receiver with all debit, credit, and bank cards owned or
14 used by the Receivership Defendants (no new cards are to be issued)
15 and immediate access to any safe deposit box(es) used by or
16 containing assets of the Receivership Defendants;
- 17 r. Immediately return to the Receiver any mail received by the
18 Receivership Defendants;
- 19 s. Provide the Receiver with a list (with contact information) of all
20 employees, agents, associates or anyone working for or with the
21 Receivership Defendants or on their behalf, and immediately
22 instruct the same to immediately cease doing business for or with the
23 Receivership Defendants except only as is necessary to comply with
24 this Order; and
- 25 t. Provide the Receiver with Soria's cell phone(s) and the requisite
26 usernames/passwords required to access data on the phone(s) by no
27 later than midnight, May 30, 2018 (Soria was ordered not to delete
28 anything from the phone(s) prior to turnover).

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1851 East First Street, 10th Floor, Santa Ana, CA 92705-4052.

On May 4, 2018, I served the within document(s) described as:

NOTICE OF LODGING OF [PROPOSED] ORDER FINDING DEFENDANTS PATRICK J. SORIA, WEST H&A LLC, WESTWOOD LEGAL, and HBSC US IN ITS CAPACITY AS LEGAL TITLE HOLDER INCORPORATED IN CONTEMPT

on each interested party in this action as stated below:

SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

BY MAIL: By placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth above. I placed each such envelope for collection and mailing following ordinary business practices. I am readily familiar with this Firm's practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited with the United States Postal Service on that same day, with postage thereon fully prepaid at Santa Ana, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 4, 2018, at Santa Ana, California.


Carina Arreola Gallardo

HALL GRIFFIN

SERVICE LIST
Nationstar Mortgage LLC vs. Patrick Joseph Soria, et al.
2:18-cv-03041 DSF (RAOx)

<p>Gary Owen Caris, Esq. Barnes & Thornburg LLP 2029 Century Park East, Suite 300 Los Angeles, CA 90067 (310) 284-3880; Fax: (310) 284-3894 gcaris@btlaw.com Attorneys for Temporary Receiver Robb Evans & Associates LLC</p> <p>[Via CM/ECF Only]</p>	<p>Sandford L. Frey, Esq. Leech Tishman Fuscaldto & Lampl, Inc. 200 South Los Robles Ave., Suite 210 Pasadena, CA 91101 (626) 796-4000; Fax: (626) 795-6321 sfrey@leechtishman.com Proposed Reorganization Counsel for Defendant Patrick Joseph Soria</p> <p>[Via CM/ECF Only]</p>
<p>Cynthia Lara 2640 W. Rialto Ave., Space No. 54 San Bernardino, CA 92410 Defendant</p>	<p>Patrick Soria 4240 Lost Hills Road, #2806 Agoura Hills, CA 91301 Defendant</p>
<p>Gricela Mendoza 3277 Michigan Ave. South Gate, CA 90280 Defendant</p>	<p>Ryan Alexander Urquizu 15231 Magnolia Blvd., Apt. 117 Sherman Oaks, CA 91403 Defendant</p>